

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

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INTEGRATED HEALTH SERVICES OF  
CLIFF MANOR, INC., INTEGRATED  
HEALTH SERVICES AT RIVERBEND, INC.  
INTEGRATED HEALTH SERVICES AT  
SOMERSET VALLEY, INC., ALPINE  
MANOR, INC., BRIARCLIFF NURSING  
HOME, INC., INTEGRATED HEALTH  
GROUP, INC., SPRING CREEK OF IHS, INC.,  
FIRELANDS OF IHS, INC., ELM CREEK OF  
IHS, INC., and IHS LONG TERM CARE  
SERVICES, INC.,

Plaintiffs-Counterclaim  
Defendants,

v.

THCI COMPANY LLC,

Defendant,

v.

ABE BRIARWOOD CORPORATION and  
JOHN DOES 1-10,

Additional Counterclaim  
Defendants.

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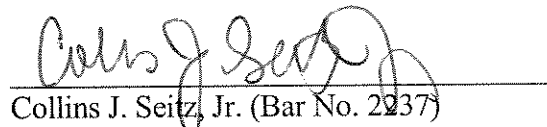
Civil Action No. 04-910 (GMS)

**DEFENDANT THCI COMPANY LLC'S RENEWED  
REPLY MEMORANDUM IN SUPPORT OF RENEWED  
CROSS-MOTION FOR PARTIAL SUMMARY JUDGMENT**

THCI Company LLC ("THCI"), by and through its undersigned counsel, files this reply memorandum in further support of THCI's Renewed Cross-Motion for Partial Summary Judgment filed on May 10, 2006 (Docket No. 166). THCI hereby renews THCI's Reply Memorandum of Law in Further Support of the Cross-Motion for Partial Summary Judgment

filed on June 29, 2005 (Docket No. 78), which is incorporated by reference herein as though fully set forth at length.

CONNOLLY BOVE LODGE & HUTZ LLP

A handwritten signature in cursive script, appearing to read "Collins J. Seitz, Jr.", is written over a horizontal line.

Collins J. Seitz, Jr. (Bar No. 2237)

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DATED: May 23, 2006

**CERTIFICATE OF SERVICE**

I, Collins J. Seitz, Jr., hereby certify that on the 23<sup>rd</sup> day of May, 2006 a true and correct copy of Defendant THCI Company LLC's Renewed Reply Memorandum in Support of Renewed Cross-Motion for Partial Summary Judgment was caused to be served by electronic mail on the attorney of record at the following address:

Richard William Riley, Esquire  
Duane Morris LLP  
1100 North Market Street  
Suite 1200  
Wilmington, DE 19801

  
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Collins J. Seitz, Jr. (Bar No. 2237)